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*Attorneys for Defendants Comerica Bank;
Conduent State & Local Solutions, Inc.;
and Conduent Business Services, LLC*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

David J. Moscato, on behalf of himself and
all others similarly situated,

Plaintiff,

v.

Comerica Bank; Conduent State & Local
Solutions, Inc.; and Conduent Business
Services, LLC,

Defendants.

Case No.: 2:23-cv-00993-JAD-DJA

**Stipulation and Proposed Order to
Substitute Counsel Under LR IA 11-6 and
Resident Nevada Counsel Under LR IA
11-2**

[ECF No. 52]

Pursuant to Local Rule IA 11-6(c), defendants Comerica Bank; Conduent State
& Local Solutions, Inc.; and Conduent Business Services, LLC (collectively,

“Defendants”), substitute David E. Chavez, Esq., as their attorney of record in place and stead of Madeleine Coles, Esq.

Further, Defendants request that Mr. Chavez be designated in place and stead of Ms. Coles as associate resident Nevada counsel (“Resident Nevada Counsel”) for the following counsel who were granted permission under Local Rule IA 11-2(a) “to appear in [this] particular case”: Jenny Nicole Perkins, ECF No. 27; Mitchell Turbenson, ECF No. 28; John C. Grugan, ECF No. 32; and Colin P. Kane, ECF No. 46 (“Pro Hac Vice Counsel”). There is good cause to grant the requested substitution because, as set forth below, Pro Hac Vice Counsel designate Mr. Chavez, Defendants appoint Mr. Chavez, and Mr. Chavez consents to serve as Resident Nevada Counsel in this matter. *See Republican Nat’l Comm. v. Burgess*, 2024 U.S. Dist. LEXIS 94801 (D. Nev. May 23, 2024) (granting a request to substitute resident Nevada counsel).

Dated: September 4, 2024

BALLARD SPAHR LLP

By: /s/ David E. Chavez

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*Attorneys for Defendants Comerica Bank,
Conduent State & Local Solutions, Inc.,
and Conduent Business Services, LLC*

[continued on following page]

Consent by Madeleine Coles

I, Madeleine Coles, consent to withdraw from this matter and the substitution of David E. Chavez in my place and stead as attorney of record for Defendants and Resident Nevada Counsel under Local Rule IA 11-2 for Jenny Nicole Perkins, Colin P. Kane, Mitchell Turbenson, and John C. Grugan.

Dated: September 4, 2024

BALLARD SPAHR LLP

By: /s/ Madeleine Coles

Madeleine Coles
Nevada Bar No. 16216
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Telephone: 702.471.7000
colesm@ballardspahr.com

Designation of Resident Attorney Admitted to the Bar of this Court

The undersigned Pro Hac Vice Counsel each consents to the withdrawal of Madeleine Coles as counsel of record for this matter and the substitution of David E. Chavez in her place and stead as attorney of record for defendants and as Resident Nevada Counsel under Local Rule IA 11-2.

Further, pursuant to the requirements of the Local Rules of Practice for this Court, Pro Hac Vice Counsel each believes it to be in the best interest of defendants to designate David E. Chavez, attorney at law, member of the State Bar of Nevada and previously admitted to practice before the above-entitled Court as Resident Nevada Counsel in this action. Mr. Chavez's address, phone number, and email address are:

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1980 Festival Plaza Drive, Suite 900
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By this designation, Pro Hac Vice Counsel and the undersigned parties each agrees that this designation constitutes agreement and authorization for Mr. Chavez to sign stipulations binding on all of us.

Dated: September 4, 2024

BALLARD SPAHR LLP

BALLARD SPAHR LLP

By: /s/ Jenny N. Perkins

By: /s/ Colin P. Kane

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Attorney for Defendants Comerica Bank; Conduent State & Local Solutions, Inc.; and Conduent Business Services, LLC

Attorney for Defendants Comerica Bank; Conduent State & Local Solutions, Inc.; and Conduent Business Services, LLC

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HOLLAND & KNIGHT LLP

By: /s/ Mitchell Turbenson

By: /s/ John C. Grugan

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Attorney for Defendants Comerica Bank; Conduent State & Local Solutions, Inc.; and Conduent Business Services, LLC

Attorney for Defendants Comerica Bank; Conduent State & Local Solutions, Inc.; and Conduent Business Services, LLC

Defendants' Appointment of Designated Resident Nevada Counsel

The undersigned parties appoint David E. Chavez as their designated Resident Nevada Counsel in this matter.

/s/ Andrew Worrall

/s/ Christine Fickel

(Party's signature)

(Party's signature)

Defendant Comerica Bank

Defendants Conduent State & Local Solutions, Inc.; and Conduent Business Services, LLC

(Party names, title)

(Party names, title)

Consent of Designee

I, David E. Chavez, consent to serve as Resident Nevada Counsel in this matter under Local Rule IA 11-2 for Jenny Nicole Perkins, Colin P. Kane, Mitchell Turbenson, and John C. Grugan.

/s/ David E. Chavez

David E. Chavez

Nevada Bar No. 15192

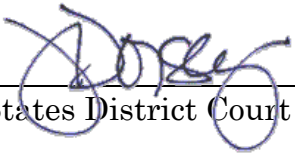
chavezd@ballardspahr.com

Order

IT IS ORDERED that the withdrawal of Madeleine Coles as attorney of record for defendants in the above action is ACCEPTED.

IT IS FURTHER ORDERED that defendants will be represented in this matter by David E. Chavez, and he shall serve as defendants' Resident Nevada Counsel under Local Rule IA 11-2 for attorneys Jenny Nicole Perkins, Colin P. Kane, Mitchell Turbenson, and John C. Grugan.

Dated: September 5, 2024



United States District Court Judge